

FILED

Joundi White  
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Jawwhite711@yahoo.com  
Plaintiff In Pro Per

2025 MAR 27 PM 2: 52

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY: 

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JOUNDI WHITE,

Plaintiff,

vs.

CITY OF LOS ANGELES; LOS  
ANGELES BOARD OF POLICE  
COMMISSIONERS; LOS  
ANGELES POLICE  
DEPARTMENT; MAYOR KAREN  
BASS; CHIEF OF POLICE  
DOMINIC CHOI; OFFICER  
GOEITTING; OFFICER REYNA;  
OFFICER OCHOA; and DOES 1-5,  
Defendants.

**CASE NO. 2:24-cv-09035-MEMF-JC**

*Hon. Maame Ewusi-Mensah Frimpong  
Crtrm. 8B (First Street Courthouse, 5th Floor)  
Hon. Mag. Judge Jacqueline Chooljian  
Crtrm. 750 (Roybal Federal Bldg. 7th Floor)*

**RESPONSE TO ORDER TO SHOW  
CAUSE (DKT. 11)**

**TO THE HONORABLE COURT:**

Plaintiff Joundi White ("Plaintiff") hereby responds to the Court's Order to  
Show Cause (Dkt. 11) why this action should not be dismissed.

ORIGINAL

1 **a. Notice**

2 All defendants were properly and timely served by the Court's deadline of  
3 January 21, 2025.

4 Defendants Goetting, Reyna, and Ochoa incorrectly assert that they were not  
5 properly served. Proofs of service have been filed with this Court showing the  
6 dates of service on each Defendant.

7 Moreover, the Answer to the Summons and Complaint filed by these  
8 Defendants demonstrates that these Defendants received adequate notice of the  
9 action against them.

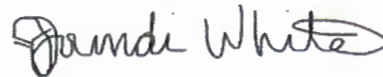
10  
11 **b. Lack of Prosecution**

12 At the beginning of 2025, Plaintiff was overwhelmed with illness and could  
13 not respond to the Court's Order, despite every intention to prosecute this case.

14 The attached Declaration, accompanied by supporting documentation  
15 regarding Plaintiff's treatment in Appendix A, attest to the fact that Plaintiff was  
16 unable (but not unwilling) to take the initial steps necessary to move this action  
17 forward.

18  
19 Based on the foregoing, Plaintiff establishes good cause that the Court shall  
20 not dismiss this action.

21  
22 Respectfully submitted,

23 

24 Dated: March 26, 2025

25 Joundi White

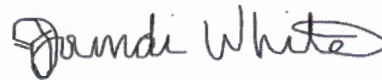
26 Plaintiff in Pro Per  
27  
28

Declaration of Joundi White

I, Joundi White, declare the following:

1. I am the plaintiff in this case.
2. I am proceeding in this matter in pro per.
3. Defendants were properly and timely served with the summons and complaint that initiated this litigation.
4. Proofs of service have been filed with this Court.
5. Despite my best efforts, I was unable to respond timely to the Court's Order to Show Cause (Dkt. 11) due to illness between December 2024 and March 2025, documentation of which is attached as Appendix A.
6. I intend to fully prosecute this litigation against Defendants.

Respectfully submitted,



Dated: March 26, 2025

Joundi White

Plaintiff in Pro Per

APPENDIX A

March 24, 2025

To Whom It May Concern,

I am writing in my capacity as a Licensed Independent Clinical Social Worker, with six years of experience in the field of mental health, to provide a professional statement regarding my client, Joundi White, whom I have been seeing since 2023.

This letter is intended for use in providing insight into Joundi's state of mind over the last four months. My client has struggled with increasing levels of stress due to unforeseen circumstances. We have worked on managing that anxiety within our sessions. It has been brought to my attention that Joundi has missed a scheduled court appointment and in my professional opinion his state of mind greatly contributed to this oversight.

Please note that the information provided in this letter is confidential and has been shared with Joundi White's consent for the specific purpose of providing context for his missed appointment. I have not included any information that would violate client-therapist privilege.

Should you require any further information or clarification, I am available to provide additional details as permitted by law and within the bounds of confidentiality. You may contact me at [jarvis@writeofhealing.com](mailto:jarvis@writeofhealing.com).

Thank you for your attention to this matter.

Best Regards,  
Jarvis T. Cleveland  
LCSW



**PROOF OF SERVICE**

*Joundi White v. City of Los Angeles, et al.*

USDC Case No. 2:24-cv-09035-MEMF-JC

I, JUDE POND, declare as follows:

I am over the age of 18 years, and not a party to this action. My business address is 3055 Wilshire Blvd, Suite 360, Los Angeles, CA 90010.

On March 27, 2025, I served the document described as RESPONSE TO ORDER TO SHOW CAUSE (DKT. 11) FILED BY PLAINTIFF JOUNDI WHITE on all interested parties or their attorneys as listed below.

DEFENDANTS CITY OF LOS ANGELES; LOS ANGELES BOARD OF POLICE COMMISSIONERS; LOS ANGELES POLICE DEPARTMENT; MAYOR KAREN BASS; OFFICER GOEITTING; OFFICER REYNA

*Served via*

Hydee Feldstein Soto, City Attorney  
Denise C. Mills, Chief Deputy City Attorney  
Kathleen Kenealy, Chief Assistant City Attorney  
Cory M. Brente, Senior Assistant City Attorney  
Dordaneh Ghaemi, Deputy City Attorney  
200 North Main Street, 6th Floor, City Hall East  
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1 *Attorneys for Defendants* CITY OF LOS ANGELES; LOS ANGELES BOARD  
2 OF POLICE COMMISSIONERS; LOS ANGELES POLICE DEPARTMENT;  
3 MAYOR KAREN BASS; OFFICER GOEITTING; and OFFICER REYNA  
4

5 DEFENDANT LOS ANGELES POLICE DEPARTMENT CHIEF OF POLICE  
6 (NOW JIM MCDONNELL)

7 100 W 1<sup>st</sup> Street  
8 Los Angeles, CA 90012  
9

10 DEFENDANT OFFICER OCHOA  
11 Los Angeles Police Department  
12 Southwest Community Police Station  
13 1546 W Martin Luther King Jr Blvd  
14 Los Angeles, CA 90062  
15

16 [X] BY MAIL

17 I deposited the document with the United States Postal Service, in a sealed  
18 envelope with postage fully prepaid. I am aware that on motion of the party served,  
19 service is presumed invalid if the postal cancellation date or postage meter date is  
20 more than one day after date of deposit for mailing affidavit.

21 I hereby certify under the penalty of perjury that the foregoing is true and  
22 correct.

23 Executed on March 27, 2025, at Los Angeles, California.  
24  
25

26 /s/ Jude Pond

27 JUDE POND  
28